



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

July 20, 2012

Bureau of Land Management  
Eastern Interior Field Office  
Attention: Eastern Interior Draft RMP/EIS  
1150 University Avenue  
Fairbanks, Alaska 99709

Re: EPA comments on the Draft Environmental Impact Statement for the Eastern Interior Draft Resource Management Plan, EPA Project #08-013-BLM.

To Whom It May Concern:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Eastern Interior Draft Resource Management Plan/Environmental Impact Statement, in interior Alaska (CEQ # 20120051). We have reviewed the EIS in accordance with our responsibilities under National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The Eastern Interior Draft RMP/EIS analyzes four management alternatives, including the No Action Alternative (A) for the approximately 6.7 million acres of BLM-administered lands in the eastern interior of Alaska. Various plans covering approximately 4.2 million acres were developed throughout the 1980s; this plan would supersede those plans as well as include another 2.5 million acres of BLM-administered land not currently covered by a management plan. The planning area is divided into four areas: The Fortymile, Steese, Upper Black River, and White Mountains subunits and encompasses four areas managed under the BLM's National Landscape Conservation System: The Birch Creek, Beaver Creek, and Fortymile National Wild and Scenic Rivers; and the Steese National Conservation Area, all designated by special provision under the Alaska National Interest Lands Conservation Act.

The BLM has identified Alternative C as its preferred alternative. This alternative designates three new Areas of Critical Environmental Concern: Fortymile, Steese, and Salmon Fork as well as retains the four existing Research Natural Areas. The EIS states that the preferred alternative proposes a balanced level of protection, use, and enhancement of resources and services, and represents the mix and variety of actions that the BLM believes best resolves the issues and management concerns in consideration of all resource values and programs.

We agree that Alternative C provides a clear balance between the ongoing needs of various stakeholders, including subsistence, resource development, research, and recreation users, with longer-term protective management strategies. We also believe that the well-executed efforts to reach out to various users and user groups has contributed to a comprehensive document that adequately analyzes a reasonable range

of alternatives, and identifies a preferred alternative that best addresses the long-term management needs for the planning area. Finally, we commend the BLM for engaging the University of Alaska, Scenarios Network for Alaska Planning Program to develop a climate change scenario for the planning area, the results of which were incorporated into the EIS. Therefore, we have given the preferred alternative a rating of "LO" or Lack of Objections. Definitions of our ratings are provided in Enclosure 1.

We offer one recommendation concerning travel management for your consideration for the final EIS. We recognize that the EIS identifies acceptable modes of access and travel for each Travel Management Area, and that a travel management plan was developed for the White Mountains NRA (included as Appendix B). We believe that development of formal travel management plans for the remaining areas will promote a better understanding of transportation restrictions, and reduce violations and confusion.

Again, we appreciate the opportunity to offer comments on the draft EIS. Please contact me at (206) 553-1601 or by email at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or by email at [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov) with any questions you have regarding our comments.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott".

Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit

Enclosure

## ENCLOSURE 1

### **U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action\***

#### **Environmental Impact of the Action**

##### **LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

##### **EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

##### **EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

##### **EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

#### **Adequacy of the Impact Statement**

##### **Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

##### **Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

##### **Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.